

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-40036-TSH
)	
)	
VINCENT KIEJZO)	
)	

MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES

Now comes the defendant Vincent Kiejzo and hereby moves, pursuant to Local Rule 7.1(b)(4), for permission to file a memorandum (Motion to Compel Discovery) in excess of twenty pages in this matter. In support of this motion, counsel for the defendant states that his Motion to Compel addresses the underlying investigation that gave rise to the issuance of the search warrant in this case, as well as numerous, complex, and specific requests for discovery as outlined in sealed discovery letters at D.E. 59. In order to properly and thoroughly marshal the facts and apply the law, he requests leave to file a brief in excess of twenty pages.

Therefore, defendant moves for leave to file his Motion to Compel that will be in excess of twenty pages.

Respectfully submitted,
VINCENT KIEJZO
By His Attorney,

/s/ Sandra Gant
Sandra Gant, B.B.O.# 680122
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on July 26, 2021.

/s/ Sandra Gant
Sandra Gant